

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RALPH “TREY” JOHNSON,
STEPHANIE KERKELES,
NICHOLAS LABELLA,
CLAUDIA RUIZ,
JACOB WILLEBEEK-LEMAIR,
ALEXA COOKE,
RHESA FOSTER,
ZACHARY HARRIS,
MATTHEW SCHMIDT,
TAMARA SCHOEN STATMAN,
GINA SNYDER,
ESTEBAN SUAREZ and
LIAM WALSH,
individually and on behalf of all persons
similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, a/k/a the NCAA, and the
following NCAA Division I Member Schools
as representatives of a Defendant Class of all
private and semi-public NCAA Division I
Member Schools:

CORNELL UNIVERSITY,
FORDHAM UNIVERSITY,
LAFAYETTE COLLEGE,
SACRED HEART UNIVERSITY,
VILLANOVA UNIVERSITY,
UNIVERSITY OF OREGON,
TULANE UNIVERSITY,
UNIVERSITY OF NOTRE DAME,
UNIVERSITY OF ARIZONA,
PURDUE UNIVERSITY,
DUKE UNIVERSITY, and
MARIST COLLEGE,

Defendants.

Case No. 2:19-cv-5230 (JP)

**DECLARATION OF CHARVI GREER IN
SUPPORT OF DEFENDANT, THE
ADMINISTRATORS OF THE TULANE
EDUCATIONAL FUND’S MOTION TO
DISMISS PURSUANT TO
RULES 12(b)(2) AND 12(b)(6)**

EXHIBIT

1

**DECLARATION OF CHARVI GREER IN SUPPORT OF
TULANE UNIVERSITY'S MOTION TO DISMISS**

1. My name is Charvi Greer. I am currently the Deputy Athletic Director, Student Services/Senior Woman Administrator (for Athletics) at Tulane University ("Tulane"). In connection with my role at Tulane, I oversee student-athlete welfare, academic advising, sports performance units and I liaise with compliance and student-athlete enhancement.
2. The foregoing is based upon my personal knowledge and review of the business records of Tulane. I would so testify were I called upon to do so in a court of law.
3. Tulane Athletics did not conduct recruiting trips or visits with Zachary Harris in Pennsylvania.
4. Tulane Football did not play any games in the state of Pennsylvania in 2014, 2016, 2017, or 2018.
5. Tulane Football played one game in the state of Pennsylvania in 2015, which took place on October 10, 2015 against Temple University.
6. Zachary Harris did not play in the October 10, 2015 game against Temple University.
7. Zachary Harris only played in three games during the 2015 football season, none of which took place in Pennsylvania.
8. No other Plaintiff in *Johnson et al. v. NCAA et al.*, United States District Court for the Eastern District of Pennsylvania, Case No. 2:19-cv-5230, including Ralph "Trey" Johnson, Stephanie Kerkeles, Claudia Ruiz, Jacob Willebeek-Lemair, Alexa Cooke, Rhesa Foster, Matthew Schmidt, Tamara Schoen Statman, Gina Snyder, or Liam Walsh, has ever played football or any other sport for Tulane.

At this time, I have nothing further to say.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the law of the United States of America that the above is true and correct to the best of my knowledge and belief.

3/20/25

Dated: _____



By: _____
CHARVI GREER